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UNITED STATES DISTRICT COURT

FOR THE NORTHERN DISTRICT OF CALIFORNIA

## SAN FRANCISCO DIVISION

AMERICAN FEDERATION OF  
GOVERNMENT EMPLOYEES, AFL-CIO,  
et al.,

Plaintiffs,

V.

DONALD J. TRUMP, in his official capacity  
as President of the United States, et al.,

## Defendants.

Case No. 3:25-cv-03698-SI

**DECLARATION OF ERIK D. OLSON IN  
SUPPORT OF MOTION FOR  
PRELIMINARY INJUNCTION**

## DECLARATION OF ERIK D. OLSON

I, Erik D. Olson, attest and declare as follows:

## I. Introduction

1. My statements in this declaration are based upon my personal knowledge, information, and belief, as well as my education, training, and employment and are offered to a reasonable degree of certainty. If called to testify, I could competently testify to the statements in this declaration.
2. I am the Senior Strategic Director for Health at the Natural Resources Defense Council (NRDC), where I work in the Environmental Health Division, which works to protect public health from environmental threats, including from toxic chemicals, drinking water contamination, air pollution, and other environmental health hazards. We particularly seek to protect those people who are most vulnerable because of their age, health status, susceptibility, or because their community is disproportionately exposed to contaminants.
3. NRDC works to safeguard the earth—its people, its plants and animals, and the natural systems on which all life depends. NRDC combines the power of hundreds of thousands of members with the expertise of some 700 scientists, lawyers, and other environmental specialists to confront the climate crisis, protect the planet's wildlife and wild places, and to ensure the rights of all people to clean air, clean water, and healthy communities.
4. I have focused much of my work on the Safe Drinking Water Act (SDWA), lead, pesticides, and other toxic chemical pollution including from per- and polyfluoroalkyl substances (PFAS) (often called “forever chemicals”), and related rules and regulations. In this work, I often rely upon the research, expertise, online materials, and publications of United States Environmental Protection Agency (EPA), Centers for Disease Control and Prevention (CDC), and the National Institutes of Health (NIH).

## II. My Work

5. As the Senior Strategic Director for Health, and previously as Director of the Health Program at NRDC, I have authored or co-authored many reports, articles and other writings regarding toxic chemicals, pesticides, and safe drinking water issues and the SDWA. I have been employed at NRDC since 2013.
6. I am often engaged in litigation and advocacy seeking to protect the public from drinking water contamination and toxic chemicals. I often work with EPA and other government officials, urging them to strengthen rules and to step in to protect communities at risk from tap water contamination or other environmental health hazards.
7. For example, in recent years I have worked with community activists, government officials, and other health and environmental experts and advocates to address the drinking water contamination and in some cases other environmental health hazards in Flint, Michigan; Benton Harbor, Michigan; Newark, New Jersey; Pittsburgh, Pennsylvania; Syracuse, New York; Milwaukee, Wisconsin; and other communities.
8. Prior to my current appointment at NRDC, I was Deputy Director of the Pew Health Group at The Pew Charitable Trusts from 2008 to 2013. At Pew I oversaw several programs including on food safety, food additives, school foods, and toxic chemicals.
9. Before my position at Pew, I was the General Counsel and Deputy Staff Director for the U.S. Senate Committee on Environment and Public Works. In that position I helped to oversee dozens of hearings and legislative markups and negotiated major legislation. For example, I was a staff negotiator on the Consumer Product Safety Improvement Act that, among other measures, banned lead in toys and children's products.
10. Prior to my Senate position, I held several positions at NRDC from 1991 to 2006, including serving as the Health Program Director, Director of the Advocacy Center, and Senior

1 Attorney. Prior to my NRDC work, I was a staff attorney for the National Wildlife  
 2 Federation from 1986-1991.

3 11. My first position after law school was as a staff attorney for EPA in the agency's Office of  
 4 General Counsel during the Reagan Administration from 1984 to 1986. While at EPA I  
 5 litigated and served as an in-house counsel primarily on the SDWA, Clean Water Act, and  
 6 hazardous waste issues.

7 12. In my work at NRDC, in the Senate, at the National Wildlife Federation, and EPA's Office  
 8 of General Counsel, I have focused a substantial portion of my work upon toxic chemicals,  
 9 pesticides, and drinking water safety for four decades.

10 11 **III. Impacts of EPA Cuts**

12 13. EPA has announced mass layoffs, reductions in force (RIFs) and reorganizations. In a  
 14 press release on May 2, 2025, EPA stated, "Following President Trump's Executive Order,  
 15 'Implementing the President's 'Department of Government Efficiency' Workforce  
 16 Optimization Initiative,' the Federal government 'commence[d] a critical transformation of  
 17 the Federal bureaucracy' to 'empower American families, workers, taxpayers, and our  
 18 system of Government itself.'"<sup>1</sup> EPA Administrator Lee Zeldin then explained how he will  
 19 be seeking "organizational improvements to the personnel structure" of EPA. He announced  
 20 plans for a significant reorganization of the EPA, and signaled major cuts in staffing to  
 21 come, especially for the agency's scientific research arm, the Office of Research and  
 22 Development or ORD. Overall, EPA expects to cut staff to levels similar to the 1980s, when  
 23 President Ronald Reagan occupied the White House.

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<sup>1</sup> <https://www.epa.gov/newsreleases/epa-announces-next-phase-organizational-improvements-better-integrate-science-agency>.

1 14. Officials at EPA town hall meetings on the afternoon of May 2, according to press accounts,  
2 encouraged employees to apply for positions at EPA program offices. “But the number of  
3 new positions, estimated at around 500 across several offices, means that approximately  
4 two-thirds of the more than 1,500 current ORD employees could be left without a job.”<sup>2</sup>  
5 The details of this reorganization and the RIFs and layoffs were not released to the public,  
6 making it impossible for NRDC and our members to fully understand what EPA staff and  
7 programs were directly affected and what the precise impacts would be of the  
8 reorganization.

9 10. 15. The statement that the EPA expects to cut staff to levels similar to the 1980’s could mean  
11 thousands fewer employees across the agency.<sup>3</sup> The agency currently has a workforce of  
12 about 15,000 people. Staffing during the Reagan administration, when I worked at EPA,  
13 fluctuated between about 11,000 to 14,000 employees.

14. 15. I understand from press accounts that EPA is eliminating its ORD, as well as its Office of  
16 Science and Technology in the Office of Water. By reorganizing its science research office,  
17 I understand that EPA expected to eliminate several hundred jobs at the agency’s Research  
18 Triangle Park campus, which does much of the agency’s research on toxic chemicals and  
19 air pollution.

20. 17. Christopher Frey, environmental engineer at North Carolina State University and EPA  
21 former science adviser and assistant administrator for the ORD, said, “The siloed remnants  
22 of the carcass of ORD will not have the capability, capacity, personnel, scientific resources,  
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<sup>2</sup> <https://cen.acs.org/environment/EPA-reorganization-hits-research-arm/103/web/2025/05>.

<sup>3</sup> <https://www.npr.org/2025/05/02/nx-s1-5385272/epa-environmental-protection-agency-cuts-trump-zeldin>.

1 scientific leadership, holistic systems approaches, scientific integrity, or independence to  
 2 adequately or appropriately meet the needs” of the whole of the EPA.<sup>4</sup>

3 18. I am deeply concerned that the elimination of EPA’s ORD will eliminate the positions of  
 4 key nationally known experts on drinking water and on toxic chemicals, including experts  
 5 on methods for reducing the corrosion of lead in drinking water and for removal of lead  
 6 from tap water through filters. We at NRDC and our members and partners in several  
 7 communities have relied upon the publications and expertise and assistance of ORD experts  
 8 in addressing lead contamination problems in Flint, Newark, NJ and other communities.  
 9 For example, ORD scientists have been leading experts on ways that water suppliers can  
 10 reduce the corrosivity of their water to reduce lead levels in drinking water.

11 19. On a April 29, 2025 webinar, ORD experts briefed NRDC staff and many small and other  
 12 water systems on their work on how to sample pipes for lead contamination and how to  
 13 effectively treat water to reduce lead levels.<sup>5</sup> As discussed on that webinar and as I have  
 14 learned from working on lead in drinking water issues for more than three decades, ORD  
 15 experts often will analyze excavated lead pipes from communities that have elevated lead  
 16 levels in tap water to expertly evaluate the “scale” (internal coating) that has built up inside  
 17 the lead pipe. They conduct these analyses to determine why corrosion control is not  
 18 working effectively in the water system and how tap water lead levels could be reduced  
 19 through improved corrosion control treatment. If ORD scientists are no longer available to  
 20 help water systems with these issues, millions of Americans served by water systems that  
 21 have elevated tap water lead levels could be put at risk of continuing to drink lead-  
 22 contaminated tap water for years to come due to inadequate corrosion control.

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27 <sup>4</sup> <https://cen.acs.org/environment/EPA-reorganization-hits-research-arm/103/web/2025/05>.

28 <sup>5</sup> <https://www.epa.gov/water-research/past-webinars-small-drinking-water-systems-series#Lead%20Chemistry,%20Communication,%20and%20Local%20Engagement>.

1       20. Within the last several weeks, NRDC scientists and I published a national map and analysis  
2       of EPA data showing that 44 million people across the country get drinking water from  
3       community water systems detecting lead at or above the EPA's new 10 parts per billion  
4       (ppb) lead action level (which becomes effective in 2027); 12.9 million people were served  
5       by systems exceeding EPA's current 15 ppb lead action level.<sup>6</sup> If ORD scientists are  
6       unavailable to help these water systems evaluate and improve their corrosion control, many  
7       residents drinking this water will be adversely affected by lead.

8       21. In Newark, New Jersey, when there was a serious lead in drinking water contamination  
9       crisis caused by inadequate corrosion control, NRDC was deeply engaged with our local  
10      partners in the effort to reduce lead levels in city tap water, and to provide at-home filters  
11      and safe water pending tap water quality improvements.<sup>7</sup> EPA ORD staff experts advised  
12      Newark officials how to improve their corrosion control and evaluated whether at-home  
13      point of use filters would adequately control lead levels in tap water.<sup>8</sup> This was critical to  
14      ultimately driving the city to supply bottled water to many residents and to expedite the  
15      city's replacement of its lead service lines.

16      22. Another example, other NRDC staff and I currently are working with local partners in  
17      Syracuse NY to address a serious lead in drinking water contamination crisis in the city.  
18      There is no safe level of exposure to lead. Test results for Syracuse released in July 2024  
19      showed that 10 percent of homes sampled showed a level of 70 parts per billion (ppb) or  
20      higher, which is more than 4 times the current EPA action level for lead. A follow-up  
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26      <sup>6</sup> <https://www.nrdc.org/resources/new-map-shows-areas-high-lead-tap-water-levels-lead-violations>

27      <sup>7</sup> <https://www.nrdc.org/resources/fighting-safe-drinking-water-newark>

28      <sup>8</sup> <https://www.epa.gov/nj/questions-and-answers-newark-drinking-water>; see also  
<https://www.watertreatmentonline.com/doc/epa-determines-newark-s-lead-filters-not-working-city-distributes-bottled-water-0001>

1 investigation by NRDC released in January 2025 found ongoing lead water contamination  
 2 issues in Syracuse.<sup>9</sup>

3 23. NRDC advocates for communities with high lead levels have historically relied upon EPA  
 4 ORD and other EPA experts to provide technical support on, for example, corrosion control  
 5 problems that contribute to lead contamination. We have asked EPA and state officials to  
 6 help address the problem in Syracuse. A recent press article reported that EPA is looking  
 7 into the problems in Syracuse to evaluate how it can help.<sup>10</sup> I am extremely concerned that  
 8 the staffing cuts and reorganizations will seriously hamper any meaningful help from EPA.

9 24. One of the issues is that Syracuse's corrosion control program is not adequate to avoid  
 10 serious lead problems, and the city is not monitoring properly, an issue we documented in  
 11 our recent report.<sup>11</sup> In addition, Syracuse has had a series of violations of the Surface Water  
 12 Treatment Rule,<sup>12</sup> which could lead to microbial contamination and waterborne disease if  
 13 not addressed. EPA's ORD scientists have traditionally been the expert group that helps to  
 14 figure out solutions to these problems, but with the layoffs so far and recently announced  
 15 plans to eliminate the ORD altogether, this presents a serious risk that EPA will be unable  
 16 to advise us or the city to help avoid lead contamination and microbial contamination. EPA's  
 17 ORD traditionally has provided expert support to communities with high levels of lead  
 18 contamination, such as Syracuse, but with the RIFs and cuts we are deeply concerned that  
 19 ORD experts will not be available to help Syracuse address its problems.

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9 <https://www.syracuse.com/news/2025/02/advocates-report-says-syracuses-bad-testing-downplays-amount-of-lead-in-water.html>

10 <https://www.syracuse.com/news/2025/04/feds-to-inspect-syracuses-drinking-water-system-after-last-years-high-lead-findings.html#:~:text=Syracuse%2C%20N.Y.,Syracuse's%20water%20system%20this%20week.>

11 <https://www.nrdc.org/sites/default/files/2025-02/swe-final-syracuse-analysis-technical-memo-jan21.pdf>

12 <https://echo.epa.gov/detailed-facility-report?fid=110004451806>

1       25. The cuts to ORD will not be limited to impacts on the office's ability to address lead  
 2       contamination in drinking water. NRDC scientists and advocates routinely rely upon EPA  
 3       ORD scientists' Integrated Risk Information System (IRIS) and other reviews of the toxicity  
 4       of chemicals to evaluate the risks posed by these chemicals, to advise allies in communities  
 5       affected by these chemicals, and to develop and file detailed comments to state and federal  
 6       agencies urging action on these chemicals. As my NRDC colleague Dr. Jennifer Sass  
 7       recently wrote in an article in Scientific American, plans to destroy EPA science will leave  
 8       the air we breathe and the water we drink more polluted:

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 10       [...]liminating scientists from the EPA is kneecapping environmental safeguards.  
 11       Every major environmental statute—the Clean Air Act, the Safe Drinking Water Act and the Superfund law governing cleanup requirements—relies on EPA  
 12       scientists to calculate how hazardous chemicals are, how people and wildlife  
 13       may be exposed and what health and ecological harms may occur. Questions  
 14       critical to environmental and community protections are researched, such as:  
 15       Will exposure to this chemical in my workplace increase my risk of breast  
 16       cancer? Is the air quality from power plant emissions safe for the neighboring  
 17       community? What is an acceptable standard for PFAS forever chemicals in our  
 18       drinking water?<sup>13</sup>

19       26. EPA ORD's IRIS provides detailed toxicological evaluations of the cancer and other health  
 20       risks posed by chemicals such as “forever chemicals” per- and polyfluoroalkyl substances  
 21       (PFAS). At NRDC, we rely heavily upon ORD's IRIS and other assessments in urging EPA  
 22       to control PFAS chemicals in environmental media including drinking water and sewage  
 23       sludge and use these assessments to urge state officials to address threats posed by these  
 24       chemicals. Similarly, ORD experts have been central to EPA's efforts to research and  
 25       evaluate how PFAS can be fully and safely destroyed, since traditional methods of disposing

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26       27       <sup>13</sup> Jennifer Sass, “As Happened in Texas, Ignoring EPA Science Will Allow Pollution and Cancer  
 28       to Fester: Trump administration plans to destroy EPA science will leave the air we breathe and the  
 water we drink more polluted.” <https://www.scientificamerican.com/article/as-happened-in-texas-ignoring-epa-science-will-allow-pollution-and-cancer-to/>

1 of or destroying hazardous waste generally cannot get rid of these highly persistent and  
 2 near-indestructible toxic chemicals.

3 27. Jennifer Orme-Zavaleta, former Principal Deputy Assistant Administrator of EPA's ORD  
 4 and former EPA Science Advisor, said on May 5, "Science is foundational to what EPA  
 5 does. The first EPA Administrator William Ruckelshaus highlighted: follow the science,  
 6 follow the law, be transparent. Without the science, I don't know how the EPA or the U.S.  
 7 for that matter can be a world leader in innovation. Science is really how we make progress  
 8 towards a healthier, more productive population. And, with a healthier population, that leads  
 9 to a more prosperous, innovative society. That's what EPA's Office of Research and  
 10 Development was about. It was there at the beginning of the agency 54 years ago, and it  
 11 was to conduct science to help inform decisions that the agency was facing. This was the  
 12 organization that helped look around the corners to see what was coming to help the agency  
 13 prepare to deal with environmental problems."<sup>14</sup>

14 28. I understand from press accounts that EPA will eliminate the ORD and instead have an  
 15 Office of Applied Science and Environmental Solutions (OASES), which will signal a shift  
 16 away from independent science.<sup>15</sup> Jennifer Orme-Zavaleta said, "One of the benefits of a  
 17 separate research and development office that was at the assistant administrator level was  
 18 that it provided independence of science. Creating a smaller science office — and it's  
 19 unclear how much research is really going to be a part of that office — under the  
 20 administrator's office certainly gives the perception of more political direction beyond a  
 21 politically appointed assistant administrator. With the moves of the scientists into the  
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26 <sup>14</sup> [https://www.environmentalprotectionnetwork.org/20250506\\_briefing-advisory/](https://www.environmentalprotectionnetwork.org/20250506_briefing-advisory/) (cleaned up).

27 <sup>15</sup> <https://www.nytimes.com/2025/03/17/climate/trump-eliminates-epa-science.html>; see also  
 28 [https://cen.acs.org/environment/EPA-reorganization-hits-research-arm/103/web/2025/05#:~:text=The%20US%20Environmental%20Protection%20Agency,ORD\)%2C%20in%20the%20announcement.](https://cen.acs.org/environment/EPA-reorganization-hits-research-arm/103/web/2025/05#:~:text=The%20US%20Environmental%20Protection%20Agency,ORD)%2C%20in%20the%20announcement.)

1 program offices as well as the creation of this new office, you have policymakers more  
 2 heavily engaged in directing what work will be done and that introduces the perception of  
 3 bias.”<sup>16</sup>

4 **III. Impact of HHS Cuts**

5 29. The Trump Administration also has undertaken a mass layoff and funding freeze program  
 6 at the Department of Health and Human Services (HHS), including at CDC and the National  
 7 Institutes of Health (NIH).

8 30. HHS has announced that it is reducing its staff by approximately 20,000 workers,<sup>17</sup>  
 9 including about 10,000 through layoffs.<sup>18</sup> The agency listed layoff numbers by sub-agency  
 10 including 3,500 at the FDA, 2,400 at the CDC, and 1,200 at NIH. Five large HHS offices  
 11 were closed: in New York City, Boston, Chicago, Seattle, and San Francisco.<sup>19</sup>

12 31. HHS employees who received Reduction in Force (“RIF”) notices as part of this mass  
 13 layoff were immediately put on 60 days of “administrative leave,” during which time they  
 14 are not able to perform work but technically remain in the government’s employ. After 60  
 15 days, they were told they will be formally separated from their employment. Because the  
 16 work of these employees ceased immediately, NRDC, our members, and our partners and  
 17 people we serve have already suffered harm because of the mass cuts.

18 32. I understand that HHS has a formal agency reorganization plan that would detail which  
 19 federal public health functions are no longer operating. However, the agency’s decision to  
 20 withhold that plan has caused further harm by preventing NRDC staff from being able to

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 26<sup>16</sup> [https://www.environmentalprotectionnetwork.org/20250506\\_briefing-advisory/](https://www.environmentalprotectionnetwork.org/20250506_briefing-advisory/)

27<sup>17</sup> <https://www.hhs.gov/press-room/hhs-restructuring-doge-fact-sheet.html>,

28<sup>18</sup> <https://www.hhs.gov/press-room/hhs-restructuring-doge.htm>

<sup>19</sup> See Fact Sheet: HHS’ Transformation to Make America Healthy Again <https://www.hhs.gov/press-room/hhs-restructuring-doge-fact-sheet.html> (last updated April 2, 2025); <https://wwwaxios.com/2025/04/07/hhs-regional-office-closures-services>.

1 properly plan for the sort of increased advice and assistance that now fall on their  
2 shoulders.

3 33. Given that much of HHS's critical work has either been severely disrupted or stopped  
4 altogether, I understand that certain offices were cut so severely that they either no longer  
5 exist or effectively no longer function.

6 34. At the CDC, these offices include, for example, groups whose work directly affects NRDC's  
7 advocacy and assistance to communities including the National Center on Birth Defects and  
8 Developmental Disabilities, the Office of Health Equity, and certain programs within the  
9 National Center for Environmental Health including: the Asthma and Air Quality Branch,  
10 Lead Poisoning Prevention and Surveillance Branch, and the Environmental Public Health  
11 Tracking Branch. In addition, the status of several critical laboratories essential for public  
12 health assessments used to inform policymaking have been closed or diminished. These  
13 laboratories serve as the reference laboratories for the nation and, without them, making  
14 well-informed decisions to protect public health becomes nearly impossible.

15 35. This causes major impacts on NRDC scientists and staff because it threatens our ability to  
16 work with community partners on addressing lead, PFAS and other toxic pollution  
17 problems, and undermines our ability to get quality, up-to-date information about the  
18 science regarding the health risks posed by these toxic chemicals. We rely regularly upon  
19 CDC and NIH publications and online materials in our work advocating for stronger  
20 environmental protections and advising states and community partners on how to protect  
21 their communities from toxic chemicals.

22 36. I understand that CDC, which provides technical support to communities with high levels  
23 of lead contamination, is cutting its lead program. CDC's National Center for  
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Environmental Health/Agency for Toxic Substances and Disease Registry (ATSDR) has historically run a program to loan agency experts on epidemiology to communities in need.

37. These cuts are directly affecting NRDC and our partners. For example, NRDC is working with a group in Milwaukee because of the city's lead contamination crisis. The city has lead service lines that contaminate city tap water and recently has discovered a serious lead paint contamination problem in its schools. We normally advise our frontline partners like this to reach out to CDC for help on lead paint issues. Milwaukee found several children suffering from high levels of lead exposure, leading to an investigation that uncovered the widespread presence of lead in city schools. Multiple schools were closed as a result.

38. In the past, school districts have turned to CDC to help manage lead problems. But the Milwaukee health department was told that a toxicologist and epidemiologist from the CDC, both lead experts who were expected to assist city officials with the local response, had been fired. Then the city health department was informed that its request for federal assistance from any CDC experts to help manage the lead crisis, known as an Epi-Aid, had been formally denied.<sup>20</sup> As this crisis has unfolded, it has been impossible to immediately and fully make up for the gaps caused by CDC's sudden exit. NRDC has for decades worked to protect the public from toxic exposures to lead. Many of our staff have worked on programs to reduce lead exposure and we have advocated for reducing lead in the environment, the replacement of lead water pipes, and lead exposure from paint in buildings including schools and homes.

<sup>20</sup> See Julie Bosman, Milwaukee's Lead Crisis. Flaky Paint, Closed Schools and a C.D.C. in Retreat, N.Y. Times (Apr. 18, 2025), available at: <https://www.nytimes.com/2025/04/18/us/milwaukee-schools-lead-cdc.html>

## IV. Conclusion

39. The extensive RIFs and firings, and secret reorganization plans at EPA and HHS are directly threatening the health and safety of millions of Americans and having a direct adverse impact on NRDC scientists and advocates who seek to protect NRDC members and our partner organizations from harm. They are forcing NRDC staff to seek to fill in gaps and provide advice and assistance, and to take actions in an attempt to improve protections for NRDC members and partners from environmental health threats posed by toxics such as PFAS and lead. Without the help of EPA, CDC and other HHS scientists and experts, the work of NRDC scientists and advocates to protect our members and partners is made far more difficult or impossible.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed on May 13, 2024, in Washington, D.C.



ERIK D. OLSON